

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

CATELIN CLOBES,

Civil Action No.

21-cv-02117-PJS-ECW

Plaintiff,

vs.

NBCUNIVERSAL MEDIA, LLC,
BRANDY ZADROZNY, and ALIZA
NADI,

**STIPULATION TO EXTEND THE
TIME TO ANSWER OR
OTHERWISE RESPOND TO THE
COMPLAINT**

Defendants.

Pursuant to Federal Rules of Civil Procedure 12 and 6(b), Plaintiff Catelin Clobes and Defendant NBCUniversal Media, LLC (“NBC”) by and through their respective counsel, hereby stipulate as follows:

WHEREAS, on December 23, 2021, Plaintiff served NBC with the Summons and Complaint;¹

WHEREAS, the deadline for NBC to answer or otherwise respond to the Complaint is currently January 13, 2022; and

WHEREAS, given the intervening holidays NBC requires additional time to review the Complaint, evaluate the claims, and prepare a response;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, that NBC’s deadline to answer or otherwise respond to Plaintiff’s Complaint is

¹ Plaintiff has not yet served individual defendants Brandy Zadrozy and Aliza Nadi with the Summons and Complaint. As such Zadrozy and Nadi have not appeared, are not parties to this stipulation, and as yet have no obligation to answer or otherwise respond to the Complaint.

extended to **February 14, 2022**. This is the first stipulated extension of time for NBC to answer or otherwise respond to Plaintiffs' Complaint.

Dated: January 11, 2022

MARJORIE J. HOLSTEN

/s/ Marjorie J. Holsetn
Marjorie J. Holsten
marjholsten@yahoo.com
9601 Annapolis Lane North
Maple Grove, MN 55369
Telephone: 763.420.7034

THE MERMIGIS LAW GROUP, P.C.

/s/ James G. Mermigis
James G. Mermigis
mermigislaw@gmail.com
(*pro hac vice forthcoming*)
85 Cold Spring Road, Suite 200
Syosset, New York 11791
Telephone: 516.353.0075

Counsel for Plaintiff

BALLARD SPAHR LLP

/s/ Leita Walker
Leita Walker (MN Bar No. 0387095)
walkerl@ballardspahr.com
2000 IDS Center
80 South 8th Street
Minneapolis, MN 55402-2119
Telephone: 612.701.5192

Leslie Minora (*pro hac vice pending*)
minoral@ballardspahr.com
1735 Market Street, 51st Floor
Philadelphia, PA 19103-7599
Telephone: 215.665.8500

Counsel for NBCUniversal Media, LLC